

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHANGHAI SHENDA II LLC,

Plaintiff,

-against-

Case # 1:20-CV-07415

STEVEN FEINSTEIN,

Defendant.

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JOINT MOTION TO DISMISS

Plaintiff Shanghai Shenda II LLC (“Plaintiff”) and Defendant Steven Feinstein (“Defendant” and with Plaintiff, the “Parties”) have entered into a settlement agreement that fully resolves the claims in Plaintiff’s complaint. Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, the Parties hereby move the Court to “So Order” the Stipulation of Settlement, which is annexed hereto as Exhibit A, and further move the Court to dismiss this action while retaining jurisdiction under the authority of *Kokkonen v. Guardian Life Insurance Company of America*, 511 U.S. 375 (1994), and its progeny, to enforce the terms of the Stipulation of Settlement or resolve any disputes thereunder. The Stipulation of Settlement is incorporated by reference into the present motion and the Parties request that the Court incorporate the terms of the Stipulation of Settlement into its dismissal order. The Parties state that the terms of this request for dismissal are proper pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure.

WHEREFORE, the Parties respectfully move the Court, under Rule 41(a)(2) of the Federal Rules of Civil Procedure, to “So Order” the Stipulation of Settlement and dismiss this action while retaining jurisdiction to enforce the terms of the Stipulation of Settlement or resolve any disputes thereunder.

Dated: March 12, 2021

KURZMAN EISENBERG CORBIN & LEVER, LLP

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SO ORDERED.

R. Abrams

Hon. Ronnie Abrams
03/19/2021